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May 17, 2019

**VIA ECF AND HAND DELIVERY**

Hon. Richard M. Berman  
United States District Judge,  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Owens, et al., 18 Cr. 693 (RMB)**

Dear Judge Berman:

We write on behalf of Defendant Harald Joachim von der Goltz regarding the conditions of his pretrial release. Under Mr. von der Goltz's bail conditions, he is permitted to reside in Massachusetts and to travel to the Southern and Eastern Districts of New York, the Southern District of Florida, and the District of Columbia. *See* Dkt. Nos. 51 (appearance bond), 53 (order shifting residence to Massachusetts). Mr. von der Goltz wishes to travel to New York next week to meet with his attorneys, but we understand that his local Pretrial Services Officer in Massachusetts believes that the Court must authorize Mr. von der Goltz to stay overnight outside Massachusetts, even when he is visiting a district to which he is permitted to travel. Because we anticipate that Mr. von der Goltz will continue to have occasion to stay overnight in New York and other districts to which he is permitted to travel, we respectfully request that the Court issue an order authorizing Mr. von der Goltz, on notice to Pretrial Services, to stay overnight in any district to which he is permitted to travel. We have conferred with counsel for the government and the Pretrial Services Office, and neither objects.

Respectfully submitted,

/s/ Daniel Koffmann  
Daniel Koffmann

cc: Officer John Moscato, Pretrial Services Office (via email)  
All counsel of record (via email and ECF)

**quinn emanuel urquhart & sullivan, llp**

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